

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

SRIONE, LLC, an Idaho limited liability company,
et al.,

Defendants.

Adv. Pro. No. 10-05380 (CGM)

**STIPULATION AND ORDER FOR VOLUNTARY
DISMISSAL OF DEFENDANT WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”), by and through their counsel, Baker & Hostetler LLP, and Defendant Eric Waldman by and through his counsel, Philip H. Stillman of Stillman & Associates (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On December 9, 2010, the Trustee filed and served his Complaint [Doc. No. 1] against Defendants Srione LLC, Dancing \$ LLC, Connie Delaney and Eric Waldman.

2. On October 19, 2011, the Trustee voluntarily dismissed Defendant Connie Delaney [Doc. No. 9].

3. On January 24, 2016, Defendants Srione LLC, Dancing \$ LLC, and Eric Waldman filed an Answer to the Complaint [Doc. No. 22].

4. On January 3, 2023, the Trustee, Srione LLC and Dancing \$ LLC filed a Stipulation for Entry of Judgment [Doc. No. 58], and on January 4, 2023, Consent Judgments were entered against Srione LLC [Doc. No. 60] and Dancing \$ [Doc. No. 61].

5. Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, as incorporated by Rule 7041 of the Federal Rules of Bankruptcy Procedure, the Parties hereby stipulate to a dismissal with prejudice of the Trustee's claims against Defendant Eric Waldman.

6. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

7. The Bankruptcy Court shall retain jurisdiction over this Stipulation.

Dated: August 14, 2023

Of Counsel:

BAKER & HOSTETLER LLP

811 Main Street, Suite 1100
Houston, Texas 77002
Attention: Dean D. Hunt
Facsimile: (713) 751-1717

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Chapter 7 Estate of Bernard L.
Madoff*

/s/ Eric Waldman
Defendant Eric Waldman

STILLMAN & ASSOCIATES

By: /s/ Philip H. Stillman
3015 North Bay Road, Suite B
Miami Beach, Florida 33140
Telephone: 888.235.4279
Facsimile: 888.235.4279
Philip H. Stillman
Email: pstillman@stillmanassociates.com

**LAW OFFICES OF STEPHEN
GOLDSTEIN**

By: /s/ Stephen A. Goldstein
3015 North Bay Road, Suite B
Miami Beach, Florida 33140
Telephone: 888.235.4279
Facsimile: 888.235.4279
Stephen A. Goldstein
Email: sgoldstein@sgoldlaw.com

Attorneys for Defendant Eric Waldman

/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**

**Dated: August 15, 2023
Poughkeepsie, New York**

